

## 1st Stakeholder Consultation – Questionnaire for Medium chain chlorinated paraffins (MCCPs) - Alkanes, C14-17, chloro (CAS 85535-85-9; EC 287-477)

### Abbreviations

EEE	Electrical and Electronic Equipment
MCCPs	Medium Chain Chlorinated Paraffins - Alkanes, C14-17, chloro
SCCPs	Short Chain Chlorinated Paraffins

### Background

The Oeko-Institut and Fraunhofer IZM have been appointed by the European Commission, within a framework contract<sup>1</sup>, among other to support the review of the list of restricted substances and to assess seven substances with a view to their possible future restriction under Directive 2011/65/EU (RoHS 2).

Medium chain chlorinated paraffins (MCCPs) - Alkanes, C14-17, chloro were specified in the project terms of reference for a detailed assessment. Initial substance information for MCCPs are compiled and available on the substance specific webpage of the stakeholder consultation (<http://rohs.exemptions.oeko.info/index.php?id=293>). The questions below outline the need for information.

### Questions

#### 1. Applications in which MCCPs is in use

- a. Please provide information concerning products and applications in which the substance is in use.
  - i. In your answer please specify if the applications specified are relevant to EEE products and applications or not.
  - ii. Please elaborate if substitution of the substance is already underway in some of these applications in relation to the properties for which MCCPs are used (for example combined plasticising and flame retarding properties) and/or in relation to specific applications in which it is used (for example PVC cables, rubber components, adhesives, etc.), and where relevant elaborate which chemical (substance level) or technological (elimination e.g. via use of alternative material) alternatives may be relevant for this purpose.
- b. Please specify if you are aware, if aside from actual use of the substance, it may be re-introduced in to the material cycle through the use of secondary materials.
  - i. Please detail in this case what secondary materials may contain MCCPs impurities and at what concentrations as well as in the production of what components/products such materials are used.

---

<sup>1</sup> The contract is implemented through Framework Contract No. FWC ENV.A.2/FRA/2015/0008 of 27/03/2015, led by Oeko-Institut e.V.

- ii. If possible please provide detail as to the changing trends of MCCPs concentrations in such secondary materials as well as the changing trend of use of the respective secondary material in EEE manufacture.
- c. Please specify in which applications MCCPs are used as a material constituent, as an additive or as an intermediate and what concentration of MCCPs remains in the final product in each of these cases (on the homogenous material level).

Please specify the MCCPs used, e.g. with regard to the degree of chlorination and content of SCCPs.

## 2. Quantities and ranges in which MCCPs are in use

- a. Please detail in what applications your company/sector applies MCCPs and give detail as to the annual amounts of use. If an exact volume cannot be specified, please provide a range of use (for example – 10-100 tonnes per annum).
- b. Please provide information as to the ranges of quantities in which you estimate that the substance is applied in general and in the EEE sector.
- c. If substitution has begun or is expected to begin shortly, please estimate how the trend of use is expected to change over the coming years.
- d. Please state on the observed decrease of MCCPs used in the EU: is this trend to be understood as a shift away from MCCPs (i.e. through a decrease in PVC cable use or in the use of other components and materials in which MCCP is present) or is the manufacture of MCCP based PVC and other MCCP based components being shifted from EU manufacturers to non-EU manufacturers (i.e. parts are imported to replace the decrease in manufacture)?

## 3. Potential emissions in the waste stream

- a. Please provide information on how EEE applications containing MCCPs are managed in the waste phase (with which waste is such EEE collected and what treatment routes are applied)?
- b. How are waste PVC cables containing MCCPs managed in the waste phase and how is copper extracted from such waste to enable recycling?
- c. How are waste rubber and waste adhesive components containing MCCPs dealt with in the waste phase?
- d. Please detail potentials for emissions in the relevant treatment processes.

## 4. Substitution

- a. For which applications is substitution underway?
  - i. For which applications is substitution scientifically or technically not practicable or reliable and why.
  - ii. Please specify in this respect which alternatives are available on the substance level (substitution) and which are available on the technological level (elimina-

tion). For example, which alternatives can be applied instead of MCCPs used in PVC cables or in rubber components and which alternative isolating materials can be applied instead of PVC/rubber in order to eliminate the need for MCCP in such applications?

- iii. What constraints exist to the implementation of the named substitutes in a specific application area (provide details on costs, reliability, availability, roadmap for substitution, etc.). For example for what range of applications can specific substitutes be used for MCCP applications in PVC cables?

## **5. Socio-economic impact of a possible restriction**

Please provide information as to the socio-economic impacts of a scenario in which MCCPs are restricted under RoHS. Please specify your answers in relation to specific applications in which the substances are used and/or in relation to the phase-in of specific alternatives in related application areas. Please refer in your answer to possible costs and benefits for various sectors, users, the environment, etc. where possible. Please support statements with quantified estimations.

## **6. Further information and comments**

The information compiled on MCCPs for the stakeholder consultation has been prepared as a summary of the publicly available information reviewed so far. If relevant, please provide further information in this regard, that you believe to have additional relevance for this review, as well as references where relevant to support your statements.

**In case parts of your contribution are confidential, please clearly mark relevant text excerpts or provide your contribution in two versions (public /confidential).**

**Finally, please do not forget to provide your contact details (Name, Organisation, e-mail and phone number) so that Oeko-Institut can contact you in case there are questions concerning your contribution.**